

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE TELADOC HEALTH, INC. SECURITIES  
LITIGATION

Case No. 1:22-cv-4687 (DLC)

**NOTICE OF MOTION TO DISMISS  
THE SECOND AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the declaration of Audra. J. Soloway and the exhibits annexed thereto, and all other papers and proceedings herein, Defendants Teladoc Health, Inc., Jason Gorevic, Mala Murthy, Stephany Verstraete, Bimal Shah, and Richard Napolitano, by and through their attorneys, hereby respectfully move this Court, before the Honorable Denise L. Cote, United States District Judge, United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, Courtroom 18B, New York, New York 10007, for an order, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act of 1995, dismissing Plaintiffs' Second Amended Class Action Complaint (ECF No. 63) on a date and time to be set by the Court. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: January 20, 2023  
New York, New York

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